

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

GINA WILLIAMS,

Plaintiff,

-against-

NEW YORK CITY HOUSING AUTHORITY,  
CAROLYN JASPER, CESAR GONZALEZ,  
MATTHEW HOFFMAN, RODNEY DAVIS, and  
THELMA WATKINS

Defendants.

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Civ.No 18-5912 (RJS)

S.D. OF N.Y.

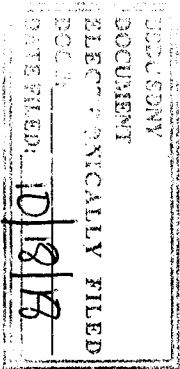
**INITIAL DISCLOSURES  
UNDER FRCP 26(a) OF  
DEFENDANTS NEW YORK  
CITY HOUSING AUTHORITY  
CAROLYN JASPER, CESAR  
GONZALEZ, MATTHEW  
HOFFMAN, RODNEY DAVIS,  
and THELMA WATKINS**

**Plaintiff Gina Williams hereby submit the following initial disclosures  
under Federal Rule of Civil Procedure ("FRCP") 26 (a)(1):**

1. Plaintiff likely to have discoverable information that Plaintiff may use to support her allegations in the amended complaint: Emails, Consent Decree signed by Chairperson Stanley Brezenoff June 11, 2018. News articles, Response letters from the New York City Housing Authority, All defendant's personnel employment files, disciplinary records, promotions and demotions including defendants witness Xenia Rivera, Responses from the EEOC, April 24, 2018 New York City Counsel transcript, employees emails, Counseling memorandums issued to plaintiff, Local hearing,.

**Documents that Plaintiff may use to support her allegations (FRCP)  
26(A)(1)(A)(ii).**

2. Collective bargaining agreement, Defendant's NYCHA policy, website article from the previous Tenant Association President of Pomonok Houses Monica



Corbett.

Plaintiff investigation and search for documents upon which it may rely in its prosecution of this action is continuing. Plaintiff reserve the right to supplement these documents as additional documents are located.

Dated: Queens, New York  
October 18, 2018

Gina Williams  
Plaintiff – Pro Se  
146-17 182<sup>nd</sup> Street  
Springfield Gardens, N.Y. 11413  
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Ginawms@verizon.net

By: 

Gina Williams

To: KELLY D. MacNEAL  
EVP for Legal Affairs and General Counsel  
New York City Housing Authority  
Nabiha Rahman  
Attorney for Defendants  
250 Broadway, 9<sup>th</sup> floor  
New York, N.Y. 10007  
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Nabiha.rahman@nycha.nyc.gov

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Gina Williams

(List the name(s) of the plaintiff(s)/petitioner(s).)

18 Civ. 5912 (RJ) (S)

- against -

**AFFIRMATION OF SERVICE**

NEW YORK CITY HOUSING AUTHORITY,  
CAROLYN JASPER, CESAR GONZALEZ,  
MATTHEW HOFFMAN, RODNEY DAVIS, THELMA WATKINS

(List the name(s) of the defendant(s)/respondent(s).)

I, (print your name) FREDERICK JONES, declare under penalty of perjury that I  
served a copy of the attached (list the names of the documents you served): INITIAL DISCLOSURES

upon all other parties in this case by (state how you served the documents, for example, hand delivery,  
mail, overnight express) 250 BROADWAY, NY NY 10007 to the

following persons (list the names and addresses of the people you served): NYCHA LAW DEPARTMENT,  
CAROLYN JASPER, CESAR GONZALEZ, MATTHEW HOFFMAN,  
RODNEY DAVIS, THELMA WATKINS

on (date you served the document(s)) OCTOBER 18, 2018

OCTOBER 18, 2018  
Dated

Signature

Address

City, State

Zip

Telephone Number

E-Mail Address